

Pat
file

192
JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Kansas City Regional Office
4609 Norfleet
Independence, MO 64055
816-353-5001

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

4510.3222 Nodaway County
Nixdorf-Lloyd Chain Co.

LOW # 88-KC-032

CERTIFIED MAIL
P 888 458 423

December 6, 1988

Mr. Robert N. Schulte, President
Nixdorf-Krein Industries, Inc.
727 Craig Road
P. O. Box 27479
St. Louis, Missouri 63141

RECEIVED
DEC 9 1988

WASTE MANAGEMENT
PROGRAM

Dear Mr. Schulte:

Enclosed please find a copy of the RCRA Compliance Inspection Report prepared pursuant to evaluation of the inactive impoundment unit in Maryville, Missouri. I believe that you will find the report to be self-explanatory.

As specified in the report, the inspection revealed two areas of apparent non-compliance cited in previous reports. Though extenuating circumstances were noted, said non-compliance still constitutes technical violations of the rules and regulations administered under authority of the Missouri Hazardous Waste Management Law. It is therefore requested that Nixdorf-Lloyd (or its responsible agent) undertake necessary corrective actions addressing the deficiencies. It is further requested that written documentation be drafted and submitted which certifies compliance with applicable rules and regulations, and responds to associated recommendations. Said documentation is to include:

- 1) Certification that inspections of the facility will continue to be performed and logged weekly as outlined in the facility inspection schedule and 40 CFR 265.15 and 265.226(b). All records/plans specified in 40 CFR 265 are required until closure is approved and interim status terminated.



R00343068
RCRA RECORDS CENTER

Mr. Robert N. Schulte, President
Nixdorf-Krein Industries, Inc.

December 6, 1988

Page 2

- 2) The facility shall submit an extended schedule and final date for completion of re-vegetation and corrective actions specified in the report. The schedule may include corrective actions already taken but shall, in no case, have a final completion date of later than April 15, 1989. A mowing schedule should be established to comply with provisions of the post-closure plan (6-inch height).

Though not a specific interim status requirement, recommendation item 3 should be incorporated in the comprehensive closure activity files to allow verification of sound closure practices.

Please submit the written response to this office (Kansas City) on, or before, January 1, 1989. It is further requested that a copy of the response be forwarded to Ms. Sandra Carroll; Chief, Hazardous Waste Enforcement; MDNR, Waste Management Program; P. O. Box 176; Jefferson City, Missouri 65102.

The Department is appreciative of your prompt attention and cooperation in this matter. Should you feel that further input or clarification is needed, please contact Mr. Steve Johnson of my staff at (816) 253-5001.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



James R. McDonathy
Regional Administrator

JRMc/SAT/bl

cc: Ms. Sandra Carroll - WMP, Enforcement
Ms. Lisa Knittell - O'Brien & Gere Engineering
Ms. Desiree Westcott - WMP Permits
Mr. Al Macali - Laclede Chain Mfg. Co.

4510.3222 Nodaway County
Nixdorf-Lloyd Chain Mfg.

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

Nixdorf-Lloyd Chain Mfg. Company
(Closed Impoundment Storage Unit)
2500 First Street
Maryville, Missouri 64468

Missouri Generator ID# : 01515
EPA ID# : MOD099238784
(816) 562-2160 - Laclede Chain Mfg. Co.
(816) 872-8500 - Nixdorf-Krein Industries
(314) 842-4550 - O'Brien and Gere Engineers, Inc.

PARTICIPANTS

Laclede Chain Mfg. Co. - Mr. Al Macali, Jr; Manager of
Environmental & Product Standards
Mo. Dept. of Natural Resources - Mr. Steve Johnson, Environmental
Specialist

INTRODUCTION

On October 26, 1988, a compliance evaluation inspection was performed at the site of a former wastewater impoundment owned by Nixdorf-Krein Industries in Maryville, Missouri. The inspection was conducted at the request of the Missouri Department of Natural Resources' Waste Management Program under authorization of Section 260.390 RSMo of the Missouri Hazardous Waste Management Law (MHWML) and Section 3007 of the Resource Conservation and Recovery Act of 1976 (RCRA). Purpose of the inspection was to confirm actions required for completion of the impoundment closure, and determine compliance with applicable interim status rules and regulations pursuant to the RCRA and MHWML.

The impoundment was inactivated in 1981 and did not accept hazardous wastewaters after that time. Since the facility is owned and managed as a RCRA unit separate from the activities engaged by Laclede Chain Mfg. Co., the unit is not directly influenced by land disposal restrictions outlined in 40 CFR Parts 260, 261, 252, 265 and 268 (Reference Federal Registers Vol. 50, No. 216, Vol. 52, Nos. 107 and 130 and Vol. 53 No. 159). Violations of land disposal restrictions are currently enforced by the USEPA.

The Nixdorf-Lloyd/Krein facility consists of a single 3/4 acre de-activated impoundment in the tertiary stage of closure.

4510.3222 Nodaway Co.
Nixdorf-Lloyd Chain Mfg.
RCRA Compliance Inspection Report

December 6, 1988
Page 2 of 4

According to reports, all physical closure activities had been executed leaving only administrative closure certification remaining. The company (Nixdorf-Krein) had submitted a letter certifying closure of the unit. Departmental approval was withheld pending formal evaluation of previously-noted deficiencies outlined in the July 29, 1988 inspection report.

At present, the unit has been de-watered, sediments stabilized and centralized in the unit and a soil cap placed on the bermed material to final grade. Mr. Macali, though an employee of Laclede Chain Mfg. proper, is charged with requisite inspections and maintenance of an on-site records. Facility consultants continue to maintain and sample the GWM wells at the facility.

UNSATISFACTORY FEATURES

- 1) Weekly inspection of the unit and monitoring wells had not been completed and logged, in accordance with the facility inspection schedule and 40 CFR 265-15 and 265-226(d). The last inspection logged was dated October 17, 1988.
- 2) The facility has failed to establish adequate vegetative cover for the inactive area as specified in the approved closure plan. Despite claimed re-seeding efforts (stated by an official of O'Brien & Gere on October 26, 1988), the cap supports sparse vegetation dominated by weedy species. Drought conditions are blamed for the lack of adequate vegetative cover.

COMMENTS

Review of on-site records revealed that all previously noted record-keeping violations had been corrected. All applicable records required of interim status facilities were maintained on-site and made available for review. First and second quarter (June 15, 1988) groundwater analysis reports were present, as were updated training records and financial assurance packages. Mr. Macali stated that O & G officials had completed well maintenance and sampling within the previous four (4) days. Data was, of course, unavailable. However data from the June, 1988, sampling event indicated that upgradient wells 4S, 5S, and 3D continue to exhibit high chloride levels (above MCL) presumably due to upgradient road maintenance salt piles. High iron (total) levels above 0.3mg/l also were observed in all wells. Lead levels were below established MCL.

4510.3222 Nodaway Co.
Nixdorf-Lloyd Chain Mfg.
RCRA Compliance Inspection Report

December 6, 1988
Page 3 of 4

for all eleven (11) downgradient wells. Integrity of existing wells was found to be satisfactory. All casings and covers were secure and had been re-packed with bentonite at the collars to eliminate annular spacing and surface water pooling.

Though not a specific interim status violation, inspection of the inactivated unit revealed two (2) features of concern regarding cap integrity. First, the cap material was exhibiting severe shrinkage as a result of persistent drought conditions. Shrinkage cracks commonly extended 12 to 14 inches below the surface of the upper topsoil layer. Topsoil observed was a greyish-brown to brown clayey silt. Due to sparse vegetation, shallow rill erosion was already noted in central and eastern areas of the cap. Weedy growth was two to four feet in height and was not subject to a regular mowing schedule. Secondly, an official of O'Brien and Gere stated in a October 26, 1988 phone conference, that compaction test data was not available for capping work completed during the 1988 calendar year. Apparently, cap construction was begun in the fall of 1987 and progressed until the last week of October 1987. Construction was halted at that time with a compaction success of 90% Standard Proctor. According to officials, early fall rainfall forced pre-mature suspension of the cap construction. Muddy conditions were claimed to have existed up to, and into, resumption of the cap construction in the early spring season of 1988. To attenuate high soil moisture conditions and allow for filling of a shallow depression created when wet cap soils were worked, officials stated that fly ash was used to solidify the material. On-site burrow areas were stated to include clayey material from demolition and construction activities around the plant. A representative from O'Brien and Gere stated that no compaction testing was known to have been performed after the small depression was stabilized in 1988. The effect of fly ash usage on the physical properties of the soil material is not known. However, modification of the geochemical matrix could conceivably yield an adverse effect on slope stability, depending upon in situ moisture conditions.

Pre-existing fencing and restriction signs were still present but access to the site is largely unrestricted. Security provisions were given lenient enforcement discretion in light of the level of closure and inaccessibility of buried stabilized wastes.

4510.3222 Modaway Co.
Nixdorf-Lloyd Chain Mfg.
RCRA Compliance Inspection Report

December 6, 1988
Page 4 of 4

RECOMMENDATIONS

- 1) Until closure has been certified and approved by the director, facility inspections and log maintenance shall continue as provided in the 40 CFR 265.15 and 265.222(b) interim status requirements.
- 2) Adequate vegetative cover must be established on the topsoil layer of the cap in accordance with the approved closure plan. Officials should consider re-tilling the soil surface to correct initial evidence of rill erosion while re-seeding is performed. A regular mowing schedule (as outlined in the post-closure plan) should be implemented to control weedy growth.
- 3) Applicable closure sampling, soil test and compaction data should be compiled and maintained at the plant as part of the existing closure records.

REPORT BY:



Steve A. Johnson
Environmental Specialist

APPROVED BY:



James R. McConathy
Regional Administrator

JRMc/SAJ/bl